

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

AALAEELDIN KHIRAWI,  
Plaintiff

v.

GETRONICS WANG CO., LLC,  
a/k/a/ and d/b/a GETRONICS,  
Defendants

CIVIL ACTION NO. 05-11877REK

**JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1**

The parties submit this Joint Statement Pursuant to Local Rule 16.1 of the United States District Court for the District of Massachusetts and the Court's Notice of Scheduling Conference. After conferring about pretrial scheduling issues, the parties agree and request that the Court approve the following Proposed Pretrial Schedule and Discovery Plan:

**Proposed Pretrial Schedule and Discovery Plan**

August 31, 2006	Deadline for completion of all fact discovery, including requests for production of documents, interrogatories and depositions.
October 31, 2006	Deadline for filing dispositive motions, if any party determines that such a motion is appropriate.
November 30, 2006	Deadline for filing oppositions to any dispositive motions.
December 15, 2006	Deadline for filing any reply to oppositions to any dispositive motions.
January 1, 2007	Deadline for Plaintiff to submit any expert reports.
March 1, 2007	Deadline for Defendant to submit any expert reports.
May 31, 2007	Deadline for completion of all expert discovery.

**Certifications**

The parties will each submit under separate cover the certification required by Local Rule 16.1(D)(3). The parties decline to have a trial in front of a Magistrate Judge.

WHEREFORE, the parties respectfully request that the Court approve their Proposed Pretrial Schedule and Discovery Plan, with such amendments as the Court deems just and proper.

Respectfully submitted,

AALAEELDIN KHIRAWI,  
By his attorney,

GETRONICS WANG CO., LLC,  
a/k/a/ and d/b/a GETRONICS  
By its attorneys,

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Dated: November 29, 2005